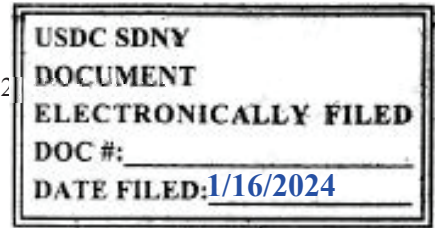


VERNER SIMON

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January 10, 2024

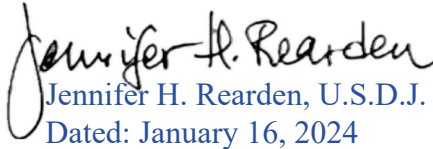


VIA ECF

Hon. Jennifer H. Reardon
United States District Court
Southern District of New York
500 Pearl Street, Room 1010
New York, NY 10007

Application GRANTED. The Court extends its condolences to Mr. Harmon and his family. The Initial Pretrial Conference scheduled for January 17, 2024 is adjourned to **Friday, February 16, 2024 at 11:30 a.m.** See ECF No. 37 for dial-in information. The Clerk of Court is directed to terminate ECF No. 38. SO ORDERED.

Re: *Harmon et al. v. Mosley et al.*
Case No.: 23-cv-04225


Jennifer H. Reardon, U.S.D.J.
Dated: January 16, 2024

Dear Judge Reardon:

We are counsel for the Plaintiffs. We write after conferring with counsel for the Defendants and Relief Defendants. This matter involves a suit to recover Plaintiffs' music producer royalties alleged to be owed to the Plaintiffs by Defendants and an alleged breach of a prior settlement agreement between certain of the parties.

Pursuant to Individual Rule 2(e) we respectfully request that the Initial Pretrial Conference set for January 17, 2024 be adjourned until February 14, 2024, or the first convenient date thereafter. This request is on consent of all the parties.

The reasons for the request are that the principal Plaintiff Jerome Harmon has for the month of December and presently been experiencing successive deaths in his immediate family. As a result, we have been unable to interact with him appropriately.

In tandem, Plaintiffs have engaged specialist counsel, Michael Selverne, to work on settlement issues with Defendants. We have been informed by Mr. Selverne that he has made progress. Defense counsel desired to address details of the settlement negotiations, however, I have objected to that for several good reasons. The parties do affirm that they will continue to pursue settlement as the Plaintiff becomes available to them.

Accordingly, the parties respectfully request that the Court adjourn the Initial Pretrial Conference to a convenient date for the Court after February 14, 2024. There are no other appearances scheduled before the Court, and the parties' requested relief will not affect any deadlines. This is the first request for an adjournment.

VERNER SIMON

Hon. Jennifer H. Reardon
January 10, 2024
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We thank the Court in advance for its consideration of this request

Respectfully submitted,
VERNER SIMON

s/ Paul W. Verner
Paul W. Verner

cc: Jonathan D. Davis, Esq. (Via ECF)
Brian D. Caplan, Esq. (Via ECF)